

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JADIANE MONTALVO

Plaintiff,

VS.

THE CITY OF KATY, TEXAS

Defendant.

§
§
§
§
§
§
§
§
§
§

C.A. NO. 4:09–CV–475

JOINT STIPULATION

In order to simplify the issues for trial, the parties stipulate and agree as follows:

1. The City of Katy has more than 101 employees and less than 200 during the time periods relevant to this suit.
2. The parties agree to supplement discovery responses on or before August 14, 2009.
3. The parties agree to produce for deposition any witness not previously disclosed and such deposition shall be completed on or before August 28, 2009.
4. The parties agree to exchange witness lists and exhibit lists on or before September 25, 2009 to enable the Joint Pre-trial order to be completed by October 9, 2009.
5. The parties agree to exchange jury questions and instructions on or before September 31, 2009 to enable the Joint Pre-trial order to be completed by October 9, 2009.
6. Provided that the materials in paragraphs 3-5 are timely exchanged, Plaintiff's counsel will serve the initial draft of the Joint Pre-trial order upon Defendant's counsel on or

before October 2, 2009. Defense counsel agrees to provide all revisions to the Joint Pre-trial order on or before October 7, 2009. Plaintiff's counsel agrees to file a final Joint Pre-trial order with the Court incorporating Defense counsel's revisions on October 9, 2009.

s/
Ken Hughes
State Bar No. 10224170
Federal I.D. 9813
First City Tower, 19th Floor
1001 Fannin, Suite 1925
Houston, TX 77002
Telephone: 713-492-0366 (main)
Facsimile: 713-456-2205
Khughes@hugheslawfirm.net

OF COUNSEL:
Jack Burleigh
State Bar No. 03419600
Federal I.D. 15045
1001 Fannin, Suite 1950
Houston, TX 77002
Telephone: 713-651-3010

s/
Brian J. Begle
State Bar No. 00785311
Federal I.D. 15767
John J. Hightower
State Bar No. 09614200
Federal I.D. 5758
Olson & Olson, LLP
Wortham Tower, Suite 600
2727 Allen Parkway
Houston, TX 7019
Telephone: 713-533-3800

CERTIFICATE OF SERVICE

I certify that on August 3, 2009 I served the foregoing Joint Stipulation upon opposing counsel via separate email and that opposing counsel will also be automatically notified as a Known Filing User of this District's Electronic Filing System.

s/ Ken Hughes